



Avista Corp.

1411 East Mission P.O. Box 3727
Spokane, Washington 99220-0500
Telephone 509-489-0500
Toll Free 800-727-9170

November 28, 2022

Public Utilities Commission of Oregon
Attn: Filing Center and Anna Kim
201 High Street SE, Suite 100
Salem, OR 97301-3612

RE: UM 1158 –Avista Utilities’ Comments Regarding Equity Metrics for Energy Trust of Oregon (ETO)

Ms. Anna Kim,

Avista Corporation, dba Avista Utilities (Avista or Company), hereby submits the following comments regarding the development of equity metrics for the Energy Trust of Oregon (ETO) in Docket No. UM 1158. Avista appreciates the opportunity to participate with Oregon Public Utility Commission (OPUC or Commission) staff and stakeholders to discuss equity metrics and work towards meaningful ways to engage underserved utility customers to enhance participation in energy efficiency programs.

As a result of communities indicating that information about energy efficiency programs is not adequately reaching participants, the first metric proposed in Theme 1 is “Increased funding to support community ambassador outreach to environmental justice communities.” While Avista agrees access to information, inclusive of improved awareness and education regarding energy efficiency programs, is a relevant and essential theme, the Company wonders if the proposed metric – the initiation of an outreach program to address an identified problem – will sufficiently measure the desired outcome. If a metric is intended to be a measure of quantitative assessment to track performance in a given area, then a recommendation to fund new outreach seems more of a tactic to reach the given theme than a metric to be measured. It seems that additional measurable metrics associated with this concept will be needed, such as the amount of funding provided for community ambassador outreach, the number of community members reached through such

outreach, and the number of community members that participate in energy efficiency programs upon learning about them from the community ambassador outreach. Without metrics regarding the success of this new outreach, it will not be possible to know if the outreach is effective or not.

Regarding Theme 2, the metric “New and expanded low-cost and no-cost offers to reduce energy burden created and launched” was proposed. Again, Avista supports the theme in general but notes that there are additional details to be measured. It is important to recognize that there are programs through Oregon Housing and Community Services (OHCS), natural gas utilities, and other community-based organizations that serve low-income and vulnerable customers. This metric should be based on the number of *new* communities reached with unique offers that are not duplicative to—or are even made in collaboration with or complementary to—what is currently available in the marketplace.

Regarding Theme 3, the Company recognizes that there is no discussion of the benefits that natural gas provides in terms of reliability and resiliency. As a provider of natural gas services in Oregon, Avista would be remiss to not note that natural gas has proven to be a reliable fuel source, as there are very few natural gas customer outages. Additionally, when electric outages do occur, customers with natural gas are often able to still use their natural gas range, fireplace, and hot water heater; having access to heat and hot water during an electric outage no doubt provides health and comfort benefits for communities served. For these reasons, Avista suggests the metric associated with Theme 3 also consider the reliability and resilience benefits provided by natural gas and other such resources.

In terms of the proposed “Other concepts to explore”, Avista suggests that the idea of “New programs for renters” include identification of ways to engage renters and landlords to gain feedback to enhance program design and, ultimately, increase participation. For the idea of “How to identify areas of high risk for climate catastrophe”, the Company suggests working with state agencies to understand what catastrophes could occur and how ETO incentives can mitigate potential impacts. Lastly, regarding the idea of utilizing utility relationships and data, the Company notes the importance of ensuring that such data be meaningful and impactful in its utilization and emphasizes that multiple data sources will be needed to provide a comprehensive look at a utility’s given customer base or to identify those customers that may, in fact, be energy burdened. Since customers receiving energy assistance, in arrears, or facing disconnection are only a very small

subset of those customers that are actually energy burdened within a given utility's service area, Avista is concerned that leveraging only utility data will cause potentially eligible customers to be missed. Privacy concerns also remain for customers that do not wish to have this type of personal information shared with ETO.

If you have any questions regarding these comments, please contact Lisa McGarity at (541) 858-4719 or lisa.mcgarity@avistacorp.com.

Sincerely,

/s/ Shawn Bonfield

Shawn Bonfield
Sr. Manager of Regulatory Policy & Strategy

